# EXHIBIT 5

**Ghazarian, Colette A**

**From:** Stameshkin, Liz
**Sent:** Tuesday, November 5, 2024 11:01 AM
**To:** David Simons; Margaux Poueymirou
**Cc:** Aaron Cera; z/Meta-Kadrey; Joe Saveri; Cadio Zirpoli; Christopher Young; Holden Benon; Matthew Butterick; Bryan L. Clobes; Alexander Sweatman; Mohammed Rathur; Nada Djordjevic; David Straite; James Ulwick; Amy Keller; Maxwell Pritt; Joshua Stein; Dunning, Angela L.; mlemley@lex-lumina.com; Llama C-Counsel
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

Counsel,

We respond to your requests below:

As an initial matter, and as we have explained, Plaintiffs' requests for production (until the 5th set of RFPs, served on October 9, 2024) did not call for source code. There is no inconsistency between the quoted language in your email below and Meta's voluntary conduct to date. Notwithstanding, and without waiver, we looked into Dr. Krein's requests and can confirm that there are not additional Issues or Pull Requests associated with the repositories noted in his declaration.

Further, we have located and collected a handful of additional GitHub repositories (including Issues and Pull Requests, to the extent available) in response to Plaintiffs' 5th Set of RFPs, which we intend to put onto the source code computers this evening. We are continuing our search for documents in response to Plaintiffs' 5th Set of RFPs, and reserve all objections as to relevance and other rights.

Finally, your email below asks about source code for "Llama's integration into Meta's commercial products." This is the first time any of Plaintiffs' counsel has raised this issue or made this request. We do not believe such a request is relevant to any claim or defense in this case, proportional to the needs of the case, or responsive to one of Plaintiffs' document requests. Nor is it timely, given that the deadline to serve new discovery was October 18. We do not intend to take action on this new, belated request.

Best,

Liz

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**From:** David Simons <dsimons@BSFLLP.com>
**Sent:** Friday, November 1, 2024 3:25 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>; Dunning, Angela L. <adunning@cgsh.com>; mlemley@lex-lumina.com; Llama C-Counsel <llama_cocounsel@bsfllp.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

**[External]**

Counsel,

We write to raise certain issues that have come to Plaintiffs' attention during their ongoing source code inspection. In short, it appears Meta has still not produced all relevance source code data, despite Meta's representation in its recent brief (Dkt. 250) that "Meta produced source code absent document requests for it, and responded to Plaintiffs' requests." Please let us know when Meta expects to address these deficiencies. Plaintiffs reserve all rights.

First, Plaintiffs' inspection has revealed that the source code on the machines has not been updated since Plaintiffs' last inspection. This includes a failure to provide any additional pull requests, commits, and issues, such as the ones referenced in the October 4, 2024 Declaration of Jonathan Krein. Please ensure the source code is updated and contains all the requested materials promptly.

Second, Plaintiffs' inspection of the source code has revealed that it does not contain any source code regarding Llama's integration into Meta's commercial products. Please produce that material immediately.

Best,
David

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**From:** David Simons <dsimons@BSFLLP.com>
**Sent:** Friday, October 25, 2024 1:16 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

Great thanks. It will be Jonathan Krein and Don Langdon attending.

Best,
David

David L. Simons
BOIES SCHILLER FLEXNER LLP

---

**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Friday, October 25, 2024 1:14:30 PM
**To:** David Simons <dsimons@BSFLLP.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>;

Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

**CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.**

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Hi David,

We can confirm that the code will be on both computers for the review next week. Can you provide the names of who will be attending the review?

Best,

Liz

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**From:** David Simons <dsimons@BSFLLP.com>
**Sent:** Thursday, October 24, 2024 4:48 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

**[External]**

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Thanks Liz.

David L. Simons
BOIES SCHILLER FLEXNER LLP

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**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Thursday, October 24, 2024 7:44:28 PM
**To:** David Simons <dsimons@BSFLLP.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

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Hi David,

We can confirm next week and the week after for review. We are working on your other request.

Best,

Liz

**From:** David Simons <dsimons@BSFLLP.com>
**Sent:** Thursday, October 24, 2024 3:30 PM
**To:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Stameshkin, Liz <lstameshkin@cooley.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

**[External]**

Counsel, following up on the below request from yesterday. Please let us know. Thanks.

David L. Simons
BOIES SCHILLER FLEXNER LLP

**From:** David Simons <dsimons@BSFLLP.com>
**Sent:** Wednesday, October 23, 2024 5:38:02 PM
**To:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Stameshkin, Liz <lstameshkin@cooley.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

Counsel,

We write to schedule an inspection of Meta's source code at Cooley's Palo Alto office for the week of October 28-November 1, as well as for November 4-6, pursuant to the stipulated Protective Order (ECF 90). We also request that Meta load the source code production on both review machines in order to facilitate two individuals reviewing the source code at the same time. Please confirm.

Thanks,
David

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**From:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Sent:** Wednesday, October 2, 2024 6:21 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Julwick@dicellolevitt.com <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>; David Simons <dsimons@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Joshua Stein <jstein@bsfllp.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

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Thanks Liz,

Yes, he had to “refresh” the system. The docs were not available on the mounted volumes, but they appear to be available now. We are taking a look now.

Thanks again,

**Margaux Poueymirou**

**Counsel**

_____

JOSEPH SAVERI
LAW FIRM

601 California Street, Suite 1000
San Francisco, CA 94108
**T** 415.500.6800 x932
**F** 415.395.9940

**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Wednesday, October 2, 2024 3:19 PM
**To:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Julwick@dicellolevitt.com; Amy Keller <akeller@dicellolevitt.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

Hi Margaux,

I believe Suresh has addressed this, but please let me know if you have further questions.

Best,

Liz

**From:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Sent:** Wednesday, October 2, 2024 1:12 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Julwick@dicellolevitt.com; Amy Keller <akeller@dicellolevitt.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

**[External]**

Hi Liz,

It would be helpful if you could tell us where the issues and pull requests are that you recently added. We have not been able to find them.

Thanks,

**Margaux Poueymirou**

**Counsel**

_____

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**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Tuesday, October 1, 2024 6:06:56 PM
**To:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Julwick@dicellolevitt.com <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

Yes will do.

We also wanted to flag that we have put the Issues and Pull Requests on the computer, which we hope you have been able to access. Please let us know of any issues there.

Best,

Liz

Sent from my iPhone

> On Oct 1, 2024, at 6:02 PM, Margaux Poueymirou <mpoueymirou@saverilawfirm.com> wrote:
>
> **[External]**
>
> ---
>
> Hi Liz,
>
> This week has been good with entry. Thanks.
>
> Can you put my name down for tomorrow too?
>
> Margaux Poueymirou
>
> Thanks.
>
> **Margaux Poueymirou**
>
> **Counsel**

_____

**Error! Filename not specified.**

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---

**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Sunday, September 29, 2024 7:54:58 PM
**To:** Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
**Cc:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Julwick@dicellolevitt.com <Julwick@dicellolevitt.com>; Amy Keller <akeller@dicellolevitt.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

Hi Margaux,

Thanks for reaching out - we have you down for this week and will check into what happened on Friday.

Best,

Liz

Sent from my iPhone

On Sep 29, 2024, at 7:27 PM, Margaux Poueymirou <mpoueymirou@saverilawfirm.com> wrote:

**[External]**

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Hi Liz,

On Friday, we went to inspect source code and there was a couple hour delay getting access apparently. I just want to make sure everything is okay for this coming week. Tomorrow, Don Langdon will be returning, and Dr. Jonathan Krein will also be joining. We already notified you of this visit.

Thanks,

**Margaux Poueymirou**

**Counsel**

_____

601 California Street, Suite 1000
San Francisco, CA 94108
**T** 415.500.6800 x932
**F** 415.395.9940

---

**From:** Margaux Poueymirou
**Sent:** Tuesday, September 24, 2024 1:20 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; julwick@dicellolevitt.com; Amy Keller <akeller@dicellolevitt.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

Hi Liz,

I'm circling back on below. Thanks.

**Margaux Poueymirou**

**Counsel**

_____

601 California Street, Suite 1000
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---

**From:** Margaux Poueymirou
**Sent:** Monday, September 23, 2024 9:03 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; julwick@dicellolevitt.com; Amy Keller

<akeller@dicellolevitt.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

Hi Liz,

Yes, we plan on reviewing the week after as well.

Can you clarify which Llama models the source code we're reviewing pertains to? It should pertain to all models, and we are concerned that it is Llama 1 and Llama 2 focused.

Thanks,

**Margaux Poueymirou**

**Counsel**

_____

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---

**From:** Stameshkin, Liz <lstameshkin@cooley.com>
**Sent:** Monday, September 23, 2024 8:22 PM
**To:** Aaron Cera <aCera@saverilawfirm.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman

<ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; julwick@dicellolevitt.com; Amy Keller <akeller@dicellolevitt.com>
**Subject:** RE: Kadrey v. Meta Platforms // Source Code Inspection

We can confirm that. Will you plan to continue the review next week?

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**From:** Aaron Cera <aCera@saverilawfirm.com>
**Sent:** Monday, September 23, 2024 1:17 PM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; julwick@dicellolevitt.com; Amy Keller <akeller@dicellolevitt.com>
**Subject:** Re: Kadrey v. Meta Platforms // Source Code Inspection

**[External]**

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Counsel,

Following up on the below.

Instead of beginning the inspection on September 30, we'd like to begin on Friday, September 27.

Please confirm. Thanks.

Best,

Aaron

**Aaron Cera**

Associate

_____

601 California Street, Suite 1505
San Francisco, CA 94108
**T** 415.500.6800 x909
**F** 415.395.9940

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**From:** Aaron Cera
**Sent:** Saturday, September 21, 2024 11:00 AM
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
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**Subject:** Kadrey v. Meta Platforms // Source Code Inspection

Counsel,

We write to schedule an inspection of Meta's source code at Cooley's Palo Alto office for the week of September 30, pursuant to the stipulated Protective Order (ECF 90).

Please confirm.

Best,

Aaron

**Aaron Cera**

Associate

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